

DATE

Thomasina Oliver
Purchasing & Property Manager
Lafayette Consolidated Government
P.O. Box 4017-C
Lafayette, Louisiana 70506

Re: **Louisiana Board of Ethics**
Docket No. 2020-789

Dear Ms. Oliver,

The Louisiana Board of Ethics, at its meeting on December 4, 2020, considered your request for approval of a disqualification plan involving Patricia Broussard, Buyer II, in the Purchasing Department of the Office of Finance and Management for the Lafayette City-Parish Consolidated Government ("LCG").

FACTS PROVIDED

Patricia Broussard is employed by LCG as a Buyer II in the Purchasing Department of the Office of Finance and Management. Her duties include administration of contracts involving the Departments of Public Works and Transportation.

Ms. Broussard's son, Marc Broussard, has recently entered into a contract with the Lafayette Utilities Systems – Communications Division ("LUS Fiber") to compose a song for use in LUS Fiber commercials. The contract is under the supervision of the LUS Fiber Department. Any amendments to the contract are required to be approved by the Lafayette Mayor-President.

The LCG Purchasing Department is tasked with the duty of processing the invoice and preparing the check for presentation to the LCG Mayor-President for approval. The LCG Purchasing Department has no supervision over the terms or conditions of the contract. Patricia Broussard had no involvement in the discussions or negotiations regarding the LUS Fiber contract with her son. Ms. Broussard's duties do not require her to have any involvement in the contract.

PROPOSED DISQUALIFICATION PLAN

The disqualification plan proposes that any processing of invoices from the contract will be handled by Tara Cazares, Buyer II, within the Purchasing Department of the Office

of Finance and Management. Ms. Cazares will report to you, which is already the standard chain of command.

LAW

La. R.S. 42:1112B(1) states that no public servant shall participate in a transaction involving the governmental entity in which, to his actual knowledge, any member of his immediate family has a substantial economic interest. La. R.S. 42:1102(13) defines “immediate family” to include a public servant’s child.

La. R.S. 42:1112C allows a disqualification plan to be developed in accordance with rules adopted by the Board to remove a public servant from participating in transactions that would otherwise present violations of Section 1112 of the Code of Governmental Ethics.

CONCLUSION

The Board concluded, and instructed me to inform you, that the proposed disqualification plan meets the requirements of Chapter 14 of the Title 52 of the Louisiana Administrative Code - Rules of the Board of Ethics.

This advisory opinion is based solely on the facts as set forth herein. Changes to the facts as presented may result in a different application of the provisions of the Code of Governmental Ethics. The Board issues no opinion as to past conduct or as to laws other than the Code of Governmental Ethics, the Campaign Finance Disclosure Act, the Lobbyist Disclosure Act, and conflict of interest provisions in the gaming laws.

If you have any questions, please contact me at (800) 842-6630 or (225) 219-5600.

Sincerely,

LOUISIANA BOARD OF ETHICS

David M. Bordelon
For the Board

cc: Patricia Broussard
Buyer II

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